

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL ACTION NO. 3:19-CV-00012

JANE DOE,

By and through her Guardian *ad litem*,
PAIGE L. PAHLKE;

And

KAREN VAUGHN, Individually,

Plaintiffs,

vs.

JAMES PAUL BLAIR, in his individual
capacity and in his official capacity as an
officer of the Lowell Police Department;

SCOTT BATES, in his official capacity as
the Chief of the Lowell Police Department;

THE CITY OF LOWELL, a North Carolina
Municipality,

Defendants.

**MOTION FOR APPOINTMENT OF
GUARDIAN AD LITEM**

NOW COMES the Plaintiffs, by and through their undersigned counsel, and hereby respectfully request that the Court appoint Paige L. Pahlke as Guardian *Ad Litem* for Jane Doe. In support of said Motion, shows the Court the following:

1. Jane Doe was born August 23, 2002. Jane Doe is a resident of Gaston County, North Carolina. She is the daughter of Karen Vaughn, who is also a Plaintiff in this action.
2. Jane Doe has one or more causes of action against the above-named defendants arising out of intentional and negligent acts committed by them.

3. Jane Doe is a sixteen (16) year old minor child and possesses few to no assets.
4. Guardianship is sought on Jane Doe's behalf for the purpose of representing her interests in this litigation.
5. Paige L. Pahlke, an attorney residing in Charlotte, North Carolina whose office address is 930 East Boulevard, Charlotte, North Carolina, 28203, has agreed to serve as the Guardian *ad litem* of the minor Jane Doe in this action.
6. Paige L. Pahlke is a suitable person to be appointed and to act as Guardian *ad litem* for said minor Plaintiff in this action.
7. The undersigned respectfully requests that the Court appoint Paige L. Pahlke, Guardian *Ad Litem* of Jane Doe, pursuant to Fed. R. Civ. P. 17.

WHEREFORE, Plaintiffs pray the Court as follows:

1. That Paige L. Pahlke be appointed Guardian *ad litem* of Plaintiff Jane Doe.

This the 8th day of January, 2019.

/s/Paul A. Tharp

Paul A. Tharp
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